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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In Re Applications of)	MM Docket No. 93-156
)	
TRINITY CHRISTIAN CENTER OF SANTA)	
ANA, INC., d/b/a TRINITY)	
BROADCASTING NETWORK)	BRCT-911129KR
)	
For Renewal of License of)	
Television Station WHSG(TV))	
Monroe, Georgia)	
)	
GLENDAL E BROADCASTING COMPANY)	BPCT-920228KE
)	
For Construction Permit)	
Monroe, Georgia)	

To: Hon. Joseph Chachkin
Administrative Law Judge

**COMMENTS ON
PETITION FOR LEAVE TO AMEND**

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network ("Trinity"), by its counsel, hereby submits the following comments on the "Petition for Leave To Amend" filed June 29, 1993, by Glendale Broadcasting Company ("Glendale").

1. Glendale's amendment reports the fact that in March 1992 Raystay Company assigned the LPTV construction permit W23AY, York, Pennsylvania, after the Commission granted the assignment application.

2. While Glendale previously reported the filing of the W23AY assignment application (see Exhibit 2 of Glendale's

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application), it never amended to report either the grant thereof or the consummation of the assignment. These reporting derelictions (among many others) were recently raised by Trinity Broadcasting of Florida, Inc. ("TBF") in its "Contingent Motion To Enlarge Issues Against Glendale Broadcasting Company," filed May 13, 1993, in MM Docket No. 93-75 (the Miami proceeding). Responding to that motion, Glendale defended its failure to report consummation of the W23AY assignment by claiming that once the application for assignment had been reported, "the obligation to further report anything was unclear."^{1/} While Glendale now repeats that claim (Petition, p. 2), Glendale's very filing of this amendment is a (belated) concession that the grant and consummation of the W23AY assignment were reportable.

3. Trinity does not oppose Glendale's amendment, since Glendale disclaims any comparative advantage and the information in the amendment is plainly required by §1.65 (as TBF pointed out in its contingent motion to enlarge). However, Trinity is constrained to make two points. First, the amendment omits many other reportable matters that TBF identified in its motion. Second, the filing of this amendment does nothing to remedy the reporting derelictions raised by TBF. As TBF noted in its motion, Glendale's controlling principal, George Gardner, is subject to a standard of "heightened scrutiny" because of his

^{1/} See, Glendale's "Opposition to Contingent Motion To Enlarge Issues Against Glendale Broadcasting Company," filed June 7, 1993, in MM Docket No. 93-75, p. 15.

record of serious prior misconduct before the Commission. Moreover, Gardner had assured the Commission in his "rehabilitation" showing in 1990 that he would be scrupulously careful to provide complete and accurate information in all future applications. His multiple reporting derelictions, whether "inadvertent" or not, must be measured in that context -- and they are not cured by this extremely tardy amendment.

Respectfully submitted,

TRINITY CHRISTIAN CENTER OF SANTA
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July 1, 1993

CERTIFICATE OF SERVICE

I, Nathaniel F. Emmons of the law firm of Mullin, Rhyne, Emmons and Topel, P.C., hereby certify that on this 1st day of July, 1993, copies of the foregoing "Comments on Petition for Leave To Amend" were sent by first class mail, postage prepaid, to the following:

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